

**Before the
Federal Communications Commission
Washington D.C. 20554**

In the Matter of)	
)	
Advanced Television Systems)	MB Docket No. 87-268
And Their Impact on the)	
Existing Television Broadcast)	
Service)	

To: The Commission

PETITION FOR RECONSIDERATION

Mississippi Television, LLC ("Mississippi Television"), by its attorneys, hereby submits this Petition for Reconsideration of the Seventh Report and Order in the above referenced docket. Mississippi Television requests a new digital allotment for WUFX(TV) (Facility ID 84253), Vicksburg, Mississippi, a singleton station ("WUFX" or the "Station") for post-transition digital television ("DTV").

Currently, WUFX operates as a singleton station on NTSC Channel 35. WUFX began operations in 2003 and thus was not eligible for a paired digital channel. Therefore, the Station elected to flash-cut to digital on Channel 35 for post-transition DTV operations. For the reasons set forth below, however, Mississippi Television submits that the public interest would be better served if WUFX were allotted Channel 41 for post-transition digital operations.

Pursuant to a shared services agreement, Mississippi Television provides technical and other services to WDBD(TV) (Facility ID 71326), Jackson, Mississippi ("WDBD"). WDBD(TV) was allotted Channel 40 for post-transition digital operations. Mississippi Television has determined that the digital operations of WDBD(TV) on Channel 40 can be diplexed with the digital operations of WUFX on Channel 41. *See* Technical Statement of

Robert Weller, Hammett & Edison, Inc., attached as Exhibit 2, which confirms the technical feasibility of this proposal.

This proposal well-serves the public interest. By consolidating the technical operations of WUFX and WDBD, WUFX will be able to provide service to 358,000 new viewers, an expansion of 68% over WUFX's allotted Channel 35 facilities. *See* Technical Statement of Robert Weller, Hammett & Edison, Inc., Exhibit 2. Significantly, WUFX's digital operations on Channel 41 will require little equipment modification. WUFX will be able to shut off its analog Channel 35 antenna and immediately begin operating on its combined Channel 41/ Channel 40 antenna. Thus, the public interest will be further served by ensuring uninterrupted service to the public. Moreover, allowing this modification will reduce the strain on equipment manufacturers, tower crews and engineers, as WUFX will not need to order or install a new digital Channel 35 antenna.

In sum, allowing WUFX to operate on Channel 41 for post-transition digital operations would better serve the public interest. It would allow WUFX to complete the transition with minimal disruption to its viewers. Additionally, it would allow WUFX bring its service to 358,000 new viewers. Accordingly, for the reasons stated herein, Mississippi Television respectfully requests that the Commission grant WUFX Channel 41 for post-transition operations and modify the DTV Table of Allotments, Appendix B, accordingly.

Respectfully submitted,

MISSISSIPPI TELEVISION, LLC

_____/s/_____
Gregory L. Masters
Joan Stewart
Its Attorneys

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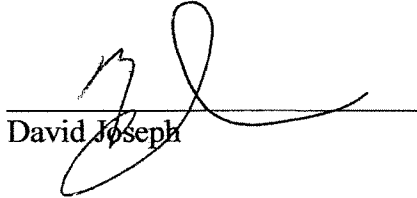
Dated: October 26, 2007

Exhibit 1

DECLARATION OF DAVID JOSEPH

I, David Joseph, hereby declare under penalty of perjury that the following is true and correct:

1. I am Manager of Mississippi License, LLC, the licensee of WUFX(TV).
2. I have reviewed the foregoing Petition for Reconsideration and, to the best of my knowledge, information and belief formed after reasonably inquiry, it is well grounded in fact.



David Joseph

Dated: October 26, 2007

Exhibit 2

DTV Station WUFX • Vicksburg, Mississippi

Statement of Hammett & Edison, Inc., Consulting Engineers

The firm of Hammett & Edison, Inc., Consulting Engineers, has been retained by Mississippi Television, LLC, licensee of Station WUFX, Channel N35/FCD Channel D35, Vicksburg, Mississippi, to prepare an engineering statement in support of its petition for reconsideration of the antenna pattern contained in Appendix B of the Seventh Report and Order to MB Docket 87-268 (7R&O).*

Background

At paragraph 72 to its 7R&O, the Commission granted certain stations' requests for alternative channel assignment to certain stations, including,

"... new licensees and permittees that attained such status after the start of the channel election process and to which we assigned a TCD for post-transition DTV operations because their assigned NTSC or DTV channel was determined to cause impermissible interference to existing licensees."

TV Station WUFX commenced operation on NTSC Channel 35 in 2003, and hence did not receive a paired (transitional) DTV channel. In Appendix B to the Seventh Further Notice of Proposed Rule Making,[†] the Commission tentatively assigned the same channel (35) to WUFX for post-transition DTV operation. That assignment was made final in Appendix B to the 7R&O.

Request for Post-Transition Operation on Channel D41

The licensee of WUFX has entered into a shared services agreement with the licensee of TV Station WDBD, FCD Channel D40, Jackson, Mississippi, and wishes to consolidate the transmission facilities for the two stations. Because of the economic benefit of sharing certain technical facilities, such consolidation would allow improved coverage for both stations in the relatively small Jackson DMA (DMA No. 89).[‡] The technical specifications of the proposed allotment are as follows:

Community:	Vicksburg, Mississippi
DTV Channel:	41
Geographic Coordinates (NAD27):	N32-12-49, W90-22-56
Antenna Height:	690 meters AMSL/598 meters HAAT
ERP:	1,000 kW
Antenna Pattern:	ID 43325 (Andrew ATW28H3-HST1)
Pattern rotation:	330°T

As shown in Figure 1, attached, the proposed allotment of Channel D41 in lieu of D35 to WUFX does not create any "DTV White Area" (areas that are within the service contour of the existing FCD35

* "Advanced Television Systems and their Impact Upon the Existing Television Broadcast Service," FCC 07-138, released August 6, 2007.

† FCC 06-150, Released October 20, 2006.

‡ Broadcasting & Cable Yearbook, 2007 edition.

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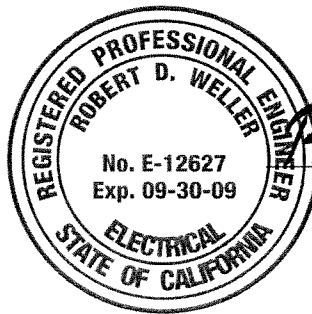
DTV Station WUFX • Vicksburg, Mississippi

allotment, but not within the proposed D41 allotment). As shown in Figure 2, the proposed allotment of Channel D41 creates only *de minimis* interference to others stations. Finally, the proposed allotment of Channel D41 to WUFX creates new service to at least 358,000 persons (2000 Census) not predicted to be served by the existing FCD35 allotment, representing a coverage improvement of over 68%.[§]

List of Figures

In carrying out these engineering studies, the following attached figure was prepared under my direct supervision:

1. Service Contours of Existing FCD35 Allotment and Proposed D41 Allotment Showing No Loss of Service
2. Results of OET-69 Interference Study showing only *de minimis* interference



Robert D. Weller, P.E.

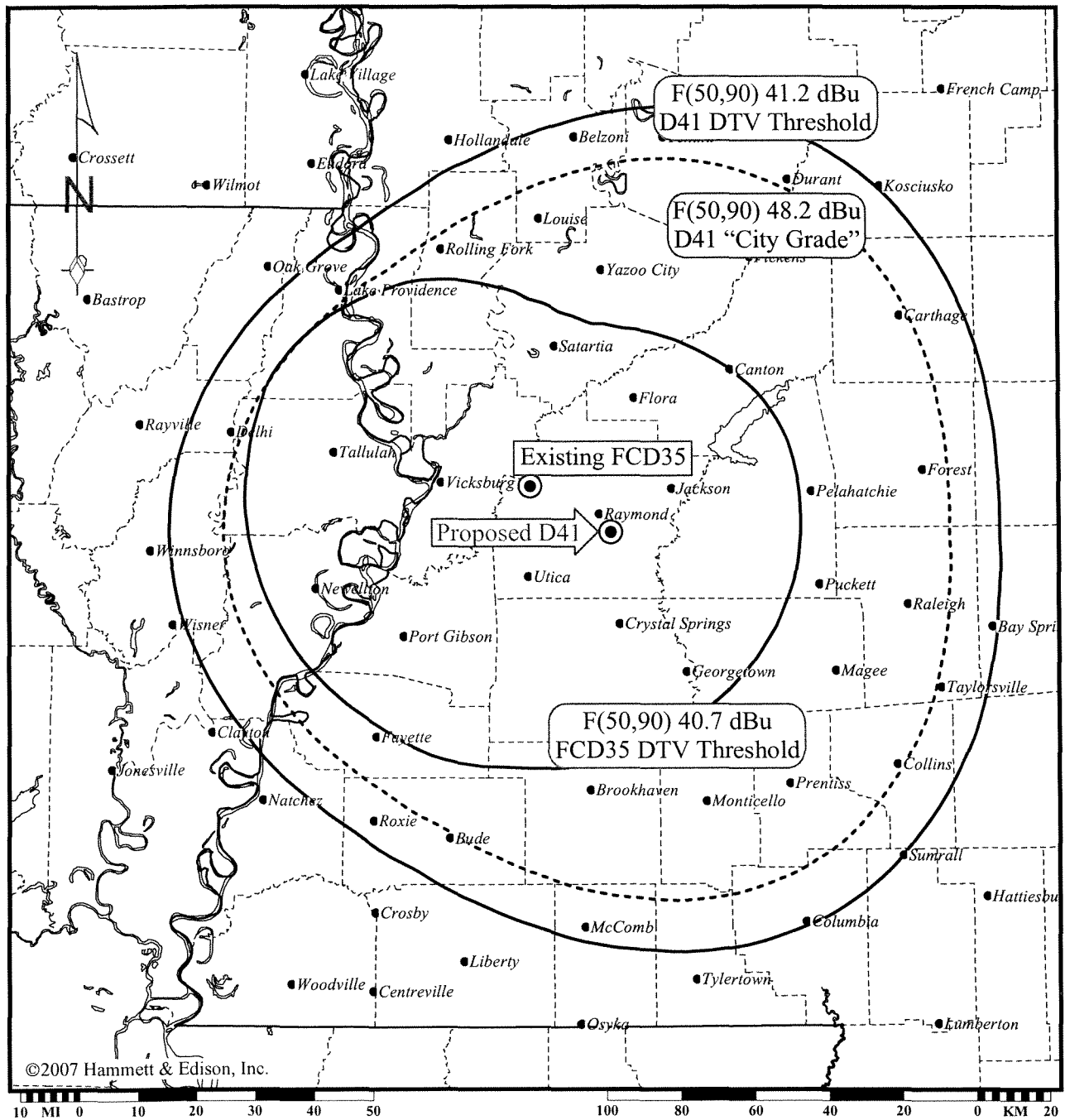
October 25, 2007

[§] As shown in Figure 2, the predicted interference-free coverage of the proposed D41 allotment is 884,264 persons (2000 U.S. Census). Appendix B of the 7R&O lists the interference free coverage of the existing FCD35 allotment as 526,000 persons. The difference between these two values is 358,264 persons, representing a 68.1% increase.



DTV Station WUFX • Vicksburg, Mississippi

Service Contours of Existing FCD35 Allotment and Proposed D41 Allotment Showing No Loss of Service



Lambert conformal conic map projection. City locations shown taken from 2000 U.S. Census Bureau TIGER data.



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Figure 1

DTV Station WUFX • Vicksburg, Mississippi

Results of OET-69 Interference Study

Percent allowed new interference: 0.100
Percent allowed new interference to Class A: 0.100
Census data selected 2000

Post Transition Data Base Selected
/space/software/cdbs/tvdb.sff_B

TV INTERFERENCE and SPACING ANALYSIS PROGRAM

Date: 10-25-2007 Time: 10:57:54

Record Selected for Analysis

WUFX USERRECORD-01 VICKSBURG MS US
Channel 41 ERP 1000. kW HAAT 596. m RCAMSL 00690 m
Latitude 032-12-49 Longitude 0090-22-56
Status APP Zone 2 Border
Dir Antenna Make CDB Model 00000000043325 Beam tilt N Ref Azimuth 330.
Last update Cutoff date Docket

Cell Size for Service Analysis 2.0 km/side

Distance Increments for Longley-Rice Analysis 1.00 km

Facility does not meet maximum height/power limits
Channel 41 ERP = 1000.00 HAAT = 596.

Azimuth (Deg)	ERP (kW)	HAAT (m)	41.0 dBu F(50,90) (km)
0.0	516.961	602.6	114.5
45.0	826.281	582.9	117.8
90.0	224.676	594.4	106.7
135.0	826.281	585.7	118.0
180.0	516.961	576.0	113.1
225.0	298.662	597.6	109.4
270.0	1000.000	622.6	121.8
315.0	298.662	605.4	109.7

Evaluation toward Class A Stations

No Spacing violations or contour overlap to Class A stations
Class A Evaluation Complete

No spacing violations found to other full service stations

LANDMOBILE SPACING VIOLATIONS FOUND
NONE

Proposed facility OK to FCC Monitoring Stations
Proposed facility OK toward West Virginia quite zone
Proposed facility OK toward Table Mountain
Proposed facility is beyond the Canadian coordination distance
Proposed facility is beyond the Mexican coordination distance
Proposed station is OK toward AM broadcast stations



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Figure 2A

DTV Station WUFX • Vicksburg, Mississippi

Results of OET-69 Interference Study

Start of Interference Analysis

Channel	Proposed Station Call	City/State	ARN
41	WUFX	VICKSBURG MS	USERRECORD01

Stations Potentially Affected by Proposed Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
40	WDBD	JACKSON MS	0.0	CP	BPCDT	-19980825KH
41	WEIQ	MOBILE AL	292.6	LIC	BLEDT	-20030430AAX
41	KBCA	ALEXANDRIA LA	257.1	CP	BPCT	-19940526KE
41	WBUY-TV	HOLLY SPRINGS MS	315.1	CP	BPCDT	-19991101AIC

%%%

Analysis of Interference to Affected Station 1

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
40	WDBD	JACKSON MS	BPCDT	-19980825KH

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
40	WPAN	FORT WALTON BEACH FL	379.6	CP	BPCDT	-19991029AGW
40	KBTB-TV	PORT ARTHUR TX	412.0	CP MOD	BMPCDT	-20040312ADS
41	WUFX	VICKSBURG MS	0.0	APP	USERRECORD-01	

Proposal causes no interference

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Analysis of Interference to Affected Station 2

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
41	WEIQ	MOBILE AL	BLEDT	-20030430AAX

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
40	WPAN	FORT WALTON BEACH FL	90.7	CP	BPCDT	-19991029AGW
42	WAKA	SELMA AL	196.4	CP	BSRCCT	-20060331ATO
42	WHMM-DT	HAMMOND LA	210.6	CP	BPCDT	-19960920LW
41	WUFX	VICKSBURG MS	292.6	APP	USERRECORD-01	

Total scenarios = 2

Result key: 1
Scenario 1 Affected station 2
Before Analysis



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Figure 2B

DTV Station WUFX • Vicksburg, Mississippi

Results of OET-69 Interference Study

Results for: 41A AL MOBILE BLEDT 20030430AAX LIC
HAAT 185.0 m, ATV ERP 199.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	913257	16457.3
not affected by terrain losses	912795	16373.4
lost to NTSC IX	0	0.0
lost to additional IX by ATV	405	12.0
lost to ATV IX only	405	12.0
lost to all IX	405	12.0

Potential Interfering Stations Included in above Scenario 1

40A FL FORT WALTON BEACH BPCDT 19991029AGW CP

After Analysis

Results for: 41A AL MOBILE BLEDT 20030430AAX LIC
HAAT 185.0 m, ATV ERP 199.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	913257	16457.3
not affected by terrain losses	912795	16373.4
lost to NTSC IX	0	0.0
lost to additional IX by ATV	722	76.0
lost to ATV IX only	722	76.0
lost to all IX	722	76.0

Potential Interfering Stations Included in above Scenario 1

40A FL FORT WALTON BEACH BPCDT 19991029AGW CP
41A MS VICKSBURG USERRECORD01 APP

Percent new IX = 0.0347%

Result key: 2
Scenario 2 Affected station 2
Before Analysis

Results for: 41A AL MOBILE BLEDT 20030430AAX LIC
HAAT 185.0 m, ATV ERP 199.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	913257	16457.3
not affected by terrain losses	912795	16373.4
lost to NTSC IX	0	0.0
lost to additional IX by ATV	405	12.0
lost to ATV IX only	405	12.0
lost to all IX	405	12.0

Potential Interfering Stations Included in above Scenario 2

40A FL FORT WALTON BEACH BPCDT 19991029AGW CP

After Analysis

Results for: 41A AL MOBILE BLEDT 20030430AAX LIC
HAAT 185.0 m, ATV ERP 199.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	913257	16457.3



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Figure 2C

DTV Station WUFX • Vicksburg, Mississippi

Results of OET-69 Interference Study

not affected by terrain losses	912795	16373.4
lost to NTSC IX	0	0.0
lost to additional IX by ATV	722	76.0
lost to ATV IX only	722	76.0
lost to all IX	722	76.0

Potential Interfering Stations Included in above Scenario 2

40A FL FORT WALTON BEACH	BPCDT	19991029AGW	CP
41A MS VICKSBURG	USERRECORD01		APP

Percent new IX = 0.0347%

Worst case new IX 0.0347% Scenario 1

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Analysis of Interference to Affected Station 3

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
41	KBCA	ALEXANDRIA LA	BPCT	-19940526KE

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
40	KBTW-TV	PORT ARTHUR TX	155.0	CP MOD	BMPCDT	-20040312ADS
41	KAZH	BAYTOWN TX	314.6	CP	BPCDT	-19991101ADZ
41	WUFX	VICKSBURG MS	257.1	APP	USERRECORD-01	

Total scenarios = 2

Result key: 3

Scenario 1 Affected station 3
Before Analysis

Results for: 41A LA ALEXANDRIA BPCT 19940526KE CP
HAAT 307.0 m, ATV ERP 191.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	368631	16253.3
not affected by terrain losses	368631	16249.2
lost to NTSC IX	0	0.0
lost to additional IX by ATV	2	4.0
lost to ATV IX only	2	4.0
lost to all IX	2	4.0

Potential Interfering Stations Included in above Scenario 1

41A TX BAYTOWN	BPCDT	19991101ADZ	CP
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After Analysis

Results for: 41A LA ALEXANDRIA BPCT 19940526KE CP
HAAT 307.0 m, ATV ERP 191.0 kW

POPULATION	AREA (sq km)
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Figure 2D

DTV Station WUFX • Vicksburg, Mississippi

Results of OET-69 Interference Study

within Noise Limited Contour	368631	16253.3
not affected by terrain losses	368631	16249.2
lost to NTSC IX	0	0.0
lost to additional IX by ATV	103	20.2
lost to ATV IX only	103	20.2
lost to all IX	103	20.2

Potential Interfering Stations Included in above Scenario 1

41A TX BAYTOWN	BPCDT	19991101ADZ	CP
41A MS VICKSBURG	USERRECORD01		APP

Percent new IX = 0.0274%

Result key: 4
 Scenario 2 Affected station 3
 Before Analysis

Results for: 41A LA ALEXANDRIA BPCT 19940526KE CP
 HAAT 307.0 m, ATV ERP 191.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	368631	16253.3
not affected by terrain losses	368631	16249.2
lost to NTSC IX	0	0.0
lost to additional IX by ATV	2	4.0
lost to ATV IX only	2	4.0
lost to all IX	2	4.0

Potential Interfering Stations Included in above Scenario 2

41A TX BAYTOWN	BPCDT	19991101ADZ	CP
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After Analysis

Results for: 41A LA ALEXANDRIA BPCT 19940526KE CP
 HAAT 307.0 m, ATV ERP 191.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	368631	16253.3
not affected by terrain losses	368631	16249.2
lost to NTSC IX	0	0.0
lost to additional IX by ATV	103	20.2
lost to ATV IX only	103	20.2
lost to all IX	103	20.2

Potential Interfering Stations Included in above Scenario 2

41A TX BAYTOWN	BPCDT	19991101ADZ	CP
41A MS VICKSBURG	USERRECORD01		APP

Percent new IX = 0.0274%

Worst case new IX 0.0274% Scenario 1

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Analysis of Interference to Affected Station 4



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 Figure 2E

DTV Station WUFX • Vicksburg, Mississippi

Results of OET-69 Interference Study

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
41	WBUY-TV	HOLLY SPRINGS MS	BPCDT	-19991101AIC

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
41	WZDX	HUNTSVILLE AL	289.0	CP MOD	BMPCDT	-20020708AAU
41	WKPD	PADUCAH KY	251.1	LIC	BLEDT	-20020304ALI
41	WUFX	VICKSBURG MS	315.1	APP	USERRECORD-01	

Total scenarios = 2

Result key: 5
Scenario 1 Affected station 4
Before Analysis

Results for: 41A MS HOLLY SPRINGS BPCDT 19991101AIC CP

HAAT 122.0 m, ATV ERP 500.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	1281972	16349.3
not affected by terrain losses	1280923	16220.9
lost to NTSC IX	0	0.0
lost to additional IX by ATV	1750	140.4
lost to ATV IX only	1750	140.4
lost to all IX	1750	140.4

Potential Interfering Stations Included in above Scenario 1

41A AL HUNTSVILLE BMPCDT 20020708AAU CP

After Analysis

Results for: 41A MS HOLLY SPRINGS BPCDT 19991101AIC CP

HAAT 122.0 m, ATV ERP 500.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	1281972	16349.3
not affected by terrain losses	1280923	16220.9
lost to NTSC IX	0	0.0
lost to additional IX by ATV	2780	172.4
lost to ATV IX only	2780	172.4
lost to all IX	2780	172.4

Potential Interfering Stations Included in above Scenario 1

41A AL HUNTSVILLE BMPCDT 20020708AAU CP
41A MS VICKSBURG USERRECORD01 APP

Percent new IX = 0.0805%

Result key: 6
Scenario 2 Affected station 4
Before Analysis

Results for: 41A MS HOLLY SPRINGS BPCDT 19991101AIC CP

HAAT 122.0 m, ATV ERP 500.0 kW



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Figure 2F

DTV Station WUFX • Vicksburg, Mississippi

Results of OET-69 Interference Study

	POPULATION	AREA (sq km)
within Noise Limited Contour	1281972	16349.3
not affected by terrain losses	1280923	16220.9
lost to NTSC IX	0	0.0
lost to additional IX by ATV	1750	140.4
lost to ATV IX only	1750	140.4
lost to all IX	1750	140.4

Potential Interfering Stations Included in above Scenario 2

41A AL HUNTSVILLE BMPCDT 20020708AAU CP

After Analysis

Results for: 41A MS HOLLY SPRINGS BPCDT 19991101AIC CP
HAAT 122.0 m, ATV ERP 500.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	1281972	16349.3
not affected by terrain losses	1280923	16220.9
lost to NTSC IX	0	0.0
lost to additional IX by ATV	2780	172.4
lost to ATV IX only	2780	172.4
lost to all IX	2780	172.4

Potential Interfering Stations Included in above Scenario 2

41A AL HUNTSVILLE BMPCDT 20020708AAU CP
41A MS VICKSBURG USERRECORD01 APP

Percent new IX = 0.0805%

Worst case new IX 0.0805% Scenario 1

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Analysis of Interference to Affected Station 5

Analysis of current record

Channel	Call	City/State	Application Ref. No.
41	WUFX	VICKSBURG MS	USERRECORD-01

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
40	WDBD	JACKSON MS	0.0	CP	BPCDT -19980825KH
41	WEIQ	MOBILE AL	292.6	LIC	BLEDT -20030430AAX
41	KBCA	ALEXANDRIA LA	257.1	CP	BPCT -19940526KE
41	WBUY-TV	HOLLY SPRINGS MS	315.1	CP	BPCDT -19991101AIC

Total scenarios = 1

Result key: 7
Scenario 1 Affected station 5
Before Analysis



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Figure 2G

DTV Station WUFX • Vicksburg, Mississippi

Results of OET-69 Interference Study

Results for: 41A MS VICKSBURG USERRECORD01 APP
HAAT 596.0 m, ATV ERP 1000.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	887081	40417.1
not affected by terrain losses	886191	40296.0
lost to NTSC IX	0	0.0
lost to additional IX by ATV	1927	177.6
lost to ATV IX only	1927	177.6
lost to all IX	1927	177.6

Potential Interfering Stations Included in above Scenario 1

41A AL MOBILE	BLEDT	20030430AAX	LIC
41A LA ALEXANDRIA	BPCT	19940526KE	CP
41A MS HOLLY SPRINGS	BPCDT	19991101AIC	CP

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Figure 2H